

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Twana Ahmed,	§	
	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	
	§	CIVIL ACTION NO. 4:23-cv-02823
	§	
Universal Protection Service, LP,	§	Jury Trial Demanded
d/b/a Allied Universal	§	
	§	
<i>Defendant.</i>	§	
	§	
	§	

PLAINTIFF TWANA AHMED’S EXHIBIT LIST

Twana Ahmed may offer or use any exhibit listed on Defendant’s exhibit list, including any amended or supplemental exhibit list.

No.	DESCRIPTION	OFFER	OBJECT	DATE ADMIT	DATE N/ADMIT
2021 blank calendars					
1	November 2021 calendar [AhmedAllied 792]				
2	December 2021 calendar [AhmedAllied 793]				
2022 blank calendars					
3	January 2022 calendar [AhmedAllied 794]				
4	February 2022 calendar [AhmedAllied 795]				
5	March 2022 calendar [AhmedAllied 796]				
6	April 2022 calendar [AhmedAllied 797]				
7	May 2022 calendar [AhmedAllied 798]				
8	June 2022 calendar [AhmedAllied 799]				

Allied Universal policies & procedures					
9	Allied Universal Code of Ethics [AhmedAllied 230-254]				
10	Allied Universal “Values— ‘What we believe’” [AUS 1623]				
11	Allied Universal “Our Clients” [AUS 1624]				
12	Allied Universal Policy Against Harassment and Discrimination [AUS 571-574]				
13	Allied Universal “Zero Tolerance Policy” [AUS 1662-1663]				
14	Allied Universal “Types of Bullying” [AUS 1669]				
15	Allied Universal “Reporting Harassment” [AUS 1671]				

16	Allied Universal “Final Thought— Would you want your child to be on the receiving end . . . ?” [AUS 1673]				
17	Allied Universal Career Org Chart [AUS 1690]				
18	Allied Universal Disciplinary Matrix [AUS 743-746]				
19	Allied Universal Use of Force and Reporting Policy [AUS 734-742]				
20	Allied Incident Reporting & Response Policy [AUS 713-721]				
21	Allied Universal Employee Relations Investigation Guidelines [AUS 1918-1921]				
22	Allied Universal Employee Relations Investigative Interview Process— Step 1 [AUS 1922-1925]				
23	Allied Universal Employee Relations Investigative Interview Forms [AUS 1930-1946]				

24	Allied Universal ESG Report 2022 [AhmedAllied 358-408]				
25	Allied Universal –About Ethics Point [AhmedAllied 409-414]				
26	AlliedUniversal employee handbook [AUS 81-268]				
2021 hiring					
27	December 15, 2021 onboarding certificates [AUS 663-664]				
28	December 15, 2021 onboarding badge receipt form [AUS 665]				
29	blank private security form requiring country of birth [AUS 01548]				
30	December 29, 2021 completed private security form with Iraq as country of birth [AUS 656]				

31	picture of Allied uniform issued to Twana Ahmed [AhmedAllied 787-788]				
32	picture of correct Allied Elite Security Officer uniform [AhmedAllied 584]				
January 2022 training					
33	picture of Twana Ahmed with Monroe McCain during training [AhmedAllied 591]				
34	picture of some people in training class with beards [AUS 1803]				
35	picture of Twana Ahmed at target qualification training [AUS 1804]				
36	video of Mauro Siboldi in Allied Taser training [AhmedAllied 617]				
37	video of Twana Ahmed in Allied Taser training [AhmedAllied 612]				

January 2022 meeting with Allied Manager Patrick Freeney					
38	January 31, 2022 texts between Twana Ahmed and Patrick Freeney [AhmedAllied 566]				
February 2022					
39	texts about working City of Houston Allied account with Ms. Travis [AhmedAllied 565]				
March 2022 encounter with drunk men arrested at H-E-B					
40	March 19, 2022 police records of two men arrested due to conduct at H-E-B on San Felipe [AhmedAllied 494-521]				
41	March 19, 2022 audio recording of 911 call due to conduct at H-E-B on San Felipe [AhmedAllied 562]				
42	March 19, 2022 picture of men arrested at H-E-B on San Felipe [Ahmed Allied 589]				

April 2022 encounter with same drunk men arrested at H-E-B					
43	April 4, 2022 texts including picture of man about whom H-E-B manager is claiming theft and other problems [AhmedAllied 594-595]				
44	April 4, 2022 pictures of two men about whom H-E-B manager is claiming theft and other problems [AhmedAllied 588]				
45	April 4, 2022 incident report and statement [AUS 671-674]				
46	Twana Ahmed phone note about April 4, 2022 incident [AhmedAllied 661]				
April 2022 suspension meeting and aftermath					
47	April 5, 2022 Twana Ahmed message to Freeney—arrived at the office [AhmedAllied 569]				
48	April 6, 2022 weapon return forms [AhmedAllied 448-449]				

49	Allied emails discussing Patrick Freeney's use of force report about Twana Ahmed [AUS 891-895, 814, 817- 820, 871, 837, 845, 836, 825, 826, 991, 972, 804, 959, 991]				
50	April 8, 2022 incident report signed by Felicia Solis-Ramirez [AUS 708-711]				
51	April 11, 2022 email from Allied human resources produced without date [AUS 1547-1548; AhmedAllied 446 (with date)]				
52	April 21, 2022 text requesting call with human resources [AhmedAllied 566]				
53	April 25, 2022 email reporting discrimination [AUS 1543]				
54	April 26, 2022 Patrick Freeney's submission form requesting Twana Ahmed's termination [AUS 700-703]				

55	April 26, 2022 email confirming termination request—cc Catherine Barnes [AUS 1542]				
56	Undated Alex Bergeron Disciplinary Notice—Bergeron did not complete Heliaus Report for April 4, 2022 incident [AUS 667]				
May 2022					
57	Early May 2022 emails with human resources [AUS 1541, 1527, 1539, 1535, 1530]				
58	May 16, 2022 email to human resources about status [AUS 1527]				
59	May 24, 2022 – May 25, 2022 texts saying ineligible for rehire and so revealing termination [AhmedAllied 570, 572]				
60	May 25, 2022-May 27, 2022 human resources communications and hotline summary [AUS 1257-1262, 1268, 1412]				

June 2022					
61	June 2022 human resources text messages [AhmedAllied 578-579]				
62	June 8, 2022 email to human resources [AUS 1332-1334]				
63	Allied emails concerning Twana Ahmed's reports of discrimination and harassment [AUS 763, 765, 769, 770, 798, 799, 802,803, 1054, 1062, 1064, 1121, 1122, 1134-1137, 1189, 1190, 1192, 1194, 1219, 1232, 1242, 1399]				
64	June 2022 not my signature communication [AUS 1219, 1064, 1913, 1062, 1216, 1912, 1057, 1213, 1054, 1206, 1209, 1203]				
65	Allied HR emails— "he said, he said" [AUS 1297-1298]				
66	fabricated discipline forms [AUS 778-779, 668-670]				

67	Allied emails concerning need to interview about “falsification of the disciplinary” [AUS 1134-1137, 1297]				
68	June 3, 2022 Patrick Freeney text—quitting [AUS 1908]				
69	June 17, 2022 Patrick Freeney separation form [AUS 1906-1907, 1909]				
reports of other Allied security guard use of force for which no incident reports were produced					
70	April 13, 2022 through June 21, 2022 news report about different Allied security guard’s use of force —pepper spray and dragging female [AhmedAllied 680-681]				
71	News video from April 13, 2022 through June 21, 2022 incident with different Allied security guard [AhmedAllied 791]				
72	July 4, 2022 records about other Allied Security guard’s use of force [AhmedAllied 757-758-782]				

73	video — two different Allied security guard's use of force — beating male already on the ground [AhmedAllied 790]				
other					
74	February 27, 2023 Allied's EEOC Position Statement [AhmedAllied 4-9]				
75	Allied training record [AUS 698-699]				
76	list of Allied Elite security officers, including Raymond Rodriguez, dated March 6, 2022 [AUS 1068-1071]				
Allied Universal knowledge and history of discrimination and failure to train					
77	<i>EEOC v. Allied Universal</i> 2018 Consent Decree Order [AhmedAllied 697-715]				
78	November 18, 2021 report of religious discrimination and harassment [AUS 1915-1917]				

79	May 11, 2023 Time Article: <i>The Problems Inside North America's Largest Security Firm—and Third-Biggest Employer</i> [AhmedAllied 668-678]				
Allied Universal financial condition— punitive damages					
80	August 18, 2022 Allied Universal website statement— "Allied Universal Named to Inc. Magazine's Annual List of Fastest-Growing Private Companies for the 13 th Time" [AhmedAllied 666-667]				
compensatory damages					
81	pictures of Twana Ahmed's family [AhmedAllied 800-802]				
exhibits to be used solely for purposes of equitable relief to be decided after a finding of liability					
82	communications job application responses [AhmedAllied 483-487, 688-695]				
83	pay records – doordash [AhmedAllied 489, 657-659, 803]				
84	pay records— Allied Universal [AUS 675-695]				

Date: May 2, 2025

Respectfully submitted,

/s/ Amanda Hernandez

Ms. Amanda C. Hernandez
Attorney-in-charge
Texas State Bar No. 24064411
Southern District Bar No. 1531045
amanda@ahfirm.com

AH Law, PLLC
5718 Westheimer, Suite 1000
Houston, Texas 77057
T: (713) 588-4359
F: (281) 572-5370

and

Ms. Amy E. Gibson
Of Counsel
Texas State Bar No. 00793801
Southern District Bar No. 20147
amy@gwfirm.com

Mr. David L. Wiley
Of Counsel
Texas State Bar No. 24029901
Southern District Bar No. 34134
david@gwfirm.com

Gibson Wiley PLLC
1500 Jackson Street #109
Dallas, Texas 75201-4923
T: (214) 522-2121
F: (214) 522-2126

Attorneys for Twana Ahmed